

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re: Bankruptcy Case No. 18-33707
Chapter 11 Case

Diocese of Winona-Rochester,

Debtor.

**NOTICE OF FILING OF AMENDED EXHIBIT A TO VERIFIED MOTION OF THE
DIOCESE OF WINONA-ROCHESTER FOR EXPEDITED RELIEF AND FOR AN
ORDER (A) AUTHORIZING PAYMENT OF PREPETITION WAGES, SALARIES,
AND EMPLOYEE DEDUCTIONS AND EMPLOYEE EXPENSES, (B)
AUTHORIZING PAYMENT OF PREPETITION UNEMPLOYMENT INSURANCE
TAXES, (C) AUTHORIZING THE DEBTOR TO CONTINUE ITS PARTICIPATION
IN ITS MEDICAL AND DENTAL HEALTH INSURANCE PROGRAMS AND
GRANTING OTHER RELIEF WITH RESPECT TO THE PROGRAMS, (D)
AUTHORIZING PRIEST SUPPORT PAYMENTS, (E) AUTHORIZING PAYMENT
OF OTHER BENEFIT AND RETIREMENT PLAN OBLIGATIONS, (F)
AUTHORIZING PAYMENT OF CERTAIN OTHER DE MINIMIS PREPETITION
CLAIMS AND SURVIVOR THERAPY CLAIMS, (G) AUTHORIZING AND
DIRECTING BANKS TO HONOR PAYROLL, EXPENSE CHECKS AND FUND
TRANSFERS IN CONNECTION WITH THE FOREGOING, (H) FINDING
COMPLIANCE WITH THE REQUIREMENTS OF RULE 6003, AND
(I) WAIVING PROVISIONS OF RULE 6004(h)**

TO: All parties-in-interest as specified in Local Rule 9013-3(a)(2)

The Diocese of Winona-Rochester (the “Diocese” or the “Debtor”) files this notice of filing of amended Exhibit A and states as follows.

1. On November 30, 2018 (the “Petition Date”), the Diocese commenced this case by filing a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

2. Also on the Petition Date, the Diocese filed a Notice of Hearing and Verified Motion of the Diocese of Winona-Rochester for Expedited Relief and for an Order (A) Authorizing Payment of Prepetition Wages, Salaries, and Employee Deductions and Employee Expenses, (B) Authorizing Payment of Prepetition Unemployment Insurance Taxes, (C) Authorizing the Debtor to Continue its Participation in its Medical and Dental Health

Insurance Programs and Granting Other Relief With Respect to the Programs, (D) Authorizing Priest Support Payments, (E) Authorizing Payment of Other Benefit and Retirement Plan Obligations, (F) Authorizing Payment of Certain Other De Minimis Prepetition Claims and Survivor Therapy Claims, (G) Authorizing and Directing Banks to Honor Payroll, Expense Checks and Fund Transfers in Connection with the Foregoing, (H) Finding Compliance with the Requirements of Rule 6003, and (I) Waiving the Provisions of Rule 6004(h) (the “Payroll Motion”) [ECF Docket No. 10].

3. Also on the Petition Date, the Diocese filed a corrected Exhibit A to the Payroll Motion [ECF Docket No. 16]. That Exhibit A was comprised of a list of outstanding checks on the Diocese’s checking accounts as of the Petition Date.

4. The Diocese has since obtained information from its bank verifying that certain of the outstanding checks listed on the prior Exhibit A had in fact cleared prior to the Petition Date. In addition, there is one additional outstanding check (a check to TotalFunds by Hasler in the amount of \$23.31) that was inadvertently omitted from the prior Exhibit A.

5. Attached as Exhibit 1 is an updated revised version of Exhibit A to the Payroll Motion, with a corrected list of outstanding checks as of the Petition Date. Attached as Exhibit 2 is a redlined set of changed pages, showing changes to the prior version of Exhibit A that was filed as ECF Docket No. 16.

Dated: December 5, 2018

RESTOVICH BRAUN & ASSOCIATES

/e/Christopher W. Coon

Thomas R. Braun (#350631)
Christopher W. Coon (#390083)
117 East Center Street
Rochester, MN 55904
(507) 216-8652
thomas@restovichlaw.com
christopher@restovichlaw.com

BODMAN PLC

/e/Brian R. Trumbauer

Robert J. Diehl, Jr. (P31264)
Brian R. Trumbauer (P57747)
Jaimee L. Witten (P70068)
6th Floor at Ford Field
1901 St. Antoine Street
Detroit, Michigan 48226
(313) 259-7777
rdiehl@bodmanlaw.com
btrumbauer@bodmanlaw.com
jwitten@bodmanlaw.com

*Proposed Attorneys for the Diocese of
Winona-Rochester*

Exhibit 1 – Amended Exhibit A to Payroll Motion

Diocese of Winona-Rochester
Summary of List of Outstanding Checks
Nov. 30, 2018

Institution	Account Name	Account #	Total Cks
Wells Fargo	Self Insurance	xxxxxx9164	\$ 37,241.73
Wells Fargo	Special Collections	xxxxxx3182	\$ 49,760.85
Wells Fargo	Employee Flex Benefits	xxxxxx8950	\$ 20,584.43
Wells Fargo	Operations	xxxxxx1041	\$ 37,598.07
Merchants Bank	Bishop's Discretionary Charitable Account	xxxxxx1346	\$ 900.00
Total Outstanding Checks			<u>\$ 146,085.08</u>

Wells Fargo Self Insurance xxxxxx9164

Date	Ck #	LookUp	Vendor	Amount
11/29/2018	0001118	6027	Meier, Kennedy & Quinn, Attorneys	\$ 18,805.00
11/29/2018	0001120	6027	Meier, Kennedy & Quinn, Attorneys	\$ 18,436.73
				<u>\$ 37,241.73</u>

Wells Fargo Special Collections xxxxxx3182

Date	Ck #	LookUp	Vendor	Amount
11/5/2018	0010763	0140	St. Thomas More Newman Center	\$ 450.00
43433	0010766	6076	USCCB-Office of Nationa Collections	\$ 49,310.85
				<u>\$ 49,760.85</u>

Wells Fargo Employee Flex Benefits xxxxxx8950

Date	Ck #	LookUp	Vendor	Amount
11/29/2018	0001169	6026	Medicare Blue RX	\$ 1,620.00
11/29/2018	0001170	6026	Medicare Blue RX	\$ 5,130.00
43433	0001172	5011	Unum Life Insurance Co. of America	\$ 9,672.26
43433	0001173	5011	Unum Life Insurance Co. of America	\$ 4,162.17
				<u>\$ 20,584.43</u>

Wells Fargo Operations xxxxxx1041

Date	Ck #	LookUp	Vendor	Amount
8/23/2018	22217	6332	Ledezma, Stephanie A	\$ 25.00
11/08/2018	22576	392	Diocese of Fargo	\$ 100.00
11/08/2018	22603	802	Wendler, Becky	\$ 77.73
11/15/2018	22617	3061	Center for Applied Research in the Apostolate (CARA)	\$ 100.00
11/15/2018	22627	3039	Hermits of St. Mary of Carmel	\$ 500.00
11/15/2018	22628	6017	Innovative Office Solutions, LLC	\$ 253.03
11/15/2018	22648	6049	S2Verify, LLC	\$ 7.00
11/15/2018	22660	355	Withrow, Camille M	\$ 10.33
11/21/2018	22663	6350	Balk, Mr. John	\$ 250.00
11/21/2018	22687	6017	Innovative Office Solutions, LLC	\$ 22.56
11/21/2018	22694	6401	Miller, Deacon Steve	\$ 70.00
11/21/2018	22696	2005	National Catholic Educational Association (NCEA)	\$ 36.00
11/21/2018	22703	4047	Sacred Heart Major Seminary	\$ 830.00
11/21/2018	22704	2	St. Adrian - Adrian	\$ 1,250.00
11/21/2018	22706	3	St. Theodore - Albert Lea	\$ 1,664.00
11/21/2018	22710	6074	USCCB-Charter Audit	\$ 8,000.00
11/21/2018	22712	6215	Vita Psychological Services	\$ 950.00
11/21/2018	22715	504	Winona-Rochester Diocesan Council of Catholic Women	\$ 1,623.47
11/29/2018	22720	6402	Association for Supervision and Curriculum Development (ASCD)	\$ 239.00
11/29/2018	22721	6398	Betzold, Brother Roger	\$ 132.16
11/29/2018	22723	6127	Brannon, Andrew D	\$ 125.16
11/29/2018	22724	413	Briskey, Philip A	\$ 90.00
11/29/2018	22725	393	Catholic Foundation of Southern Minnesota	\$ 324.30
11/29/2018	22727	393	Catholic Foundation of Southern Minnesota	\$ 40.00
11/29/2018	22728	5082	City of Winona - Finance Dept	\$ 1,277.16
11/29/2018	22729	87	Co-Cathedral of St. John the Evangelist - Rochester	\$ 2,527.58
11/29/2018	22731	4034	Coordinated Business Systems, Ltd	\$ 134.37
11/29/2018	22734	129	Dose, Lawrence J	\$ 30.00
11/29/2018	22735	1096	Dougherty, Patrick	\$ 2,588.79
11/29/2018	22736	6009	FedEx	\$ 90.00
11/29/2018	22737	6010	Fellowship of Catholic University Students (FOCUS)	\$ 6,250.00
11/29/2018	22738	6010	Fellowship of Catholic University Students (FOCUS)	\$ 3,000.00
11/29/2018	22739	223	Ferguson, Rev. Timothy	\$ 75.00
11/29/2018	22743	6370	Kruse, Brother Joseph	\$ 100.00
11/29/2018	22746	896	Liturgy Training Publications	\$ 29.00
11/29/2018	22747	2037	Midtown Foods	\$ 167.84
11/29/2018	22748	2019	NET Ministries	\$ 1,500.00
11/29/2018	22752	4047	Sacred Heart Major Seminary	\$ 430.35
11/29/2018	22753	575	St. Mary's University	\$ 1,512.63
11/29/2018	22754	6070	TotalFunds by Hasler	\$ 50.00
11/29/2018	22757	6360	Willkom, Matthew L	\$ 40.80
11/29/2018	22759	2087	Silver Eagle Trucking Inc	\$ 85.00
11/30/2018	22719	664	Sutton, Rev. Brian	\$ 966.50
11/30/2018	22760	6070	TotalFunds by Hasler	\$ 23.31
				<u>\$ 37,598.07</u>

Merchants Bank Bishop's Discretionary Charitable Account xxx1346

Date	Ck #	LookUp	Vendor	Amount
11/27/2018	10154	4046	Carmelites of St. Joseph	\$ 300.00
11/29/2018	10155		Province of St Joseph - Fr Solanus Casey Center 1780 Mt Elliott, Detroit, MI 48207	\$ 600.00
				<hr/> \$ 900.00

Exhibit 2 – Redlined Changed Pages to Amended Exhibit A to Payroll Motion

Wells Fargo Special Collections xxxxxx3182

Date	Ck #	LookUp	Vendor	Amount
11/5/2018	0010763	0140	St. Thomas More Newman Center	\$ 450.00
11/21/2018	0010765	6076	USCCB-Office of National Collections	\$ 23,868.50
43433	0010766	6076	USCCB-Office of National Collections	\$ 49,310.85
				<u>\$ 73,629.35</u>

Wells Fargo Operations xxxxxx1041

Date	Ck #	LookUp	Vendor	Amount
8/23/2018	22217	6332	Ledezma, Stephanie A	\$ 25.00
10/11/2018	22472	355	Withrow, Camille M	\$ 101.37
11/01/2018	22550	417	Cooper, Jenna M	\$ 24.98
11/08/2018	22576	392	Diocese of Fargo	\$ 100.00
11/08/2018	22595	257	Quinn, Most Rev. John M	\$ 200.00
11/08/2018	22603	802	Wendler, Becky	\$ 77.73
11/15/2018	22609	2025	Archdiocese of Detroit - Priest Pension Plan	\$ 1,303.67
11/15/2018	22617	3061	Center for Applied Research in the Apostolate (CARA)	\$ 100.00
11/15/2018	22619	2061	Dana's Landscaping & Lawn Care	\$ 975.00
11/15/2018	22622	2002	Exploring the Sunday Readings	\$ 22.50
11/15/2018	22627	3039	Hermits of St. Mary of Carmel	\$ 500.00
11/15/2018	22628	6017	Innovative Office Solutions, LLC	\$ 253.03
11/15/2018	22643	398	Reller, Nicholas J	\$ 58.86
11/15/2018	22648	6049	S2Verify, LLC	\$ 7.00
11/15/2018	22660	355	Withrow, Camille M	\$ 10.33
11/21/2018	22663	6350	Balk, Mr. John	\$ 250.00
11/21/2018	22666	393	Catholic Foundation of Southern Minnesota	\$ 44,353.43
11/21/2018	22667	393	Catholic Foundation of Southern Minnesota	\$ 75.00
11/21/2018	22668	6400	Catholic Herald	\$ 500.00
11/21/2018	22673	417	Cooper, Jenna M	\$ 481.77
11/21/2018	22685	3051	Image Bridge Design	\$ 162.50
11/21/2018	22686	141	Immaculate Heart of Mary Seminary	\$ 650.00
11/21/2018	22687	6017	Innovative Office Solutions, LLC	\$ 22.56
11/21/2018	22688	4039	J & J Rubbish Service	\$ 75.23
11/21/2018	22691	896	Liturgy Training Publications	\$ 415.66
11/21/2018	22693	687	Mahon, Rev. Msgr. Gerald	\$ 1,509.47
11/21/2018	22694	6401	Miller, Deacon Steve	\$ 70.00
11/21/2018	22696	2005	National Catholic Educational Association (NCEA)	\$ 36.00
11/21/2018	22698	2019	NET Ministries	\$ 1,885.00
11/21/2018	22703	4047	Sacred Heart Major Seminary	\$ 830.00
11/21/2018	22704	2	St. Adrian - Adrian	\$ 1,250.00
11/21/2018	22705	575	St. Mary's University	\$ 9,930.82
11/21/2018	22706	3	St. Theodore - Albert Lea	\$ 1,664.00
11/21/2018	22710	6074	USCCB-Charter Audit	\$ 8,000.00
11/21/2018	22712	6215	Vita Psychological Services	\$ 950.00
11/21/2018	22715	504	Winona-Rochester Diocesan Council of Catholic Women	\$ 1,623.47
11/21/2018	22716	355	Withrow, Camille M	\$ 6.38
11/21/2018	22717	6092	Xcel Energy	\$ 1,450.00
11/29/2018	22720	6402	Association for Supervision and Curriculum Development (ASCD)	\$ 239.00
11/29/2018	22721	6398	Betzold, Brother Roger	\$ 132.16
11/29/2018	22723	6127	Brannon, Andrew D	\$ 125.16
11/29/2018	22724	413	Briskey, Philip A	\$ 90.00
11/29/2018	22725	393	Catholic Foundation of Southern Minnesota	\$ 324.30
11/29/2018	22726	393	Catholic Foundation of Southern Minnesota	\$ 36.00
11/29/2018	22727	393	Catholic Foundation of Southern Minnesota	\$ 40.00
11/29/2018	22728	5082	City of Winona - Finance Dept	\$ 1,277.16
11/29/2018	22729	87	Co-Cathedral of St. John the Evangelist - Rochester	\$ 2,527.58
11/29/2018	22730	213	Cook, Rev. Msgr. Thomas	\$ 229.12
11/29/2018	22731	4034	Coordinated Business Systems, Ltd	\$ 134.37
11/29/2018	22732	6263	Dell Business Credit	\$ 8,068.49
11/29/2018	22733	1015	Diocese of Winona-Rochester (Benefits)	\$ 30,271.51
11/29/2018	22734	129	Dose, Lawrence J	\$ 30.00
11/29/2018	22735	1096	Dougherty, Patrick	\$ 2,588.79
11/29/2018	22736	6009	FedEx	\$ 90.00
11/29/2018	22737	6010	Fellowship of Catholic University Students (FOCUS)	\$ 6,250.00
11/29/2018	22738	6010	Fellowship of Catholic University Students (FOCUS)	\$ 3,000.00
11/29/2018	22739	223	Ferguson, Rev. Timothy	\$ 75.00
11/29/2018	22740	201	Hamann, Mary A	\$ 43.05
11/29/2018	22741	137	Harrington, Most Rev. Bernard J	\$ 73.28
11/29/2018	22742	3077	Hawkins Ash CPAs	\$ 9,646.87
11/29/2018	22743	6370	Kruse, Brother Joseph	\$ 100.00
11/29/2018	22744	5048	Kwik Trip Stores	\$ 237.55
11/29/2018	22745	5048	Kwik Trip Stores	\$ 699.89
11/29/2018	22746	896	Liturgy Training Publications	\$ 29.00
11/29/2018	22747	2037	Midtown Foods	\$ 167.84
11/29/2018	22748	2019	NET Ministries	\$ 1,500.00
11/29/2018	22749	6273	PEX Card ePay	\$ 1,726.25
11/29/2018	22750	257	Quinn, Most Rev. John M	\$ 58.90

11/29/2018	22752	4047	Sacred Heart Major Seminary	\$	430.35
11/29/2018	22753	575	St. Mary's University	\$	1,512.63
11/29/2018	22754	6070	TotalFunds by Hasler	\$	50.00
11/29/2018	22755	300	Visa	\$	1,500.00
11/29/2018	22757	6360	Willkom, Matthew L	\$	40.80
11/29/2018	22759	2087	Silver Eagle Trucking Inc	\$	85.00
11/30/2018	22719	664	Sutton, Rev. Brian	\$	966.50
11/30/2018	22760	6070	TotalFunds by Hasler	\$	23.31
11/30/2018	22761	213	Cook, Rev. Msgr. Thomas	\$	766.66
				\$	<u>155,137.28</u>

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Diocese of Winona-Rochester,

Debtor.

Bankruptcy Case No.
Chapter 11 Case

CERTIFICATE OF SERVICE

I, Laverne Stewart, under penalty of perjury, states that on December 5, 2018, she caused to be filed electronically with the Clerk of Court and served by overnight delivery (via Federal Express or Priority Mail Express, as indicated on Exhibit A) the following document on the service list attached as Exhibit A:

Notice of Filing of Amended Exhibit A to Verified Motion of the Diocese of Winona-Rochester for Expedited Relief and for an Order (A) Authorizing Payment of Prepetition Wages, Salaries, and Employee Deductions and Employee Expenses, (B) Authorizing Payment of Prepetition Unemployment Insurance Taxes, (C) Authorizing the Debtor to Continue its Participation in its Medical and Dental Health Insurance Programs and Granting Other Relief with Respect to the Programs, (D) Authorizing Priest Support Payments, (E) Authorizing Payment of Other Benefit and Retirement Plan Obligations, (F) Authorizing Payment of Certain Other De Minimis Prepetition Claims and Survivor Therapy Claims, (G) Authorizing and Directing Banks to Honor Payroll, Expense Checks and Fund Transfers in Connection with the Foregoing, (H) Finding Compliance with the Requirements of Rule 6003, and (I) Waiving Provisions of Rule 6004(h)

Dated: December 5, 2018



Laverne Stewart

EXHIBIT A – SERVICE LIST

VIA FEDERAL EXPRESS

Office of the United States Trustee
300 South Fourth Street
Suite 1015
Minneapolis, MN 55415

IRS District Counsel
380 Jackson St., Suite 650
St. Paul, MN 55101

Internal Revenue Service
Wells Fargo Place
30 E. 70th Street
Mail Stop 5700
St. Paul, MN 55101

Minnesota Department of Revenue
Collection Enforcement
551 Bankruptcy Section
600 North Robert Street
St. Paul, MN 55101-2228

Office of the U.S. Attorney
300 South Fourth Street
Suite 600
Minneapolis, MN 55415

Diocese of Winona-Rochester
55 West Sanborn Street
P.O. Box 588
Winona, MN 55987

Certain Tort Claimants
c/o Jeff Anderson & Associates PA
Attn: Jeff Anderson
366 Jackson Street, Suite 100
St. Paul, MN 55101

Certain Tort Claimants
c/o Noaker Law Firm LLC
Attn: Patrick Noaker
333 Washington Avenue N., Suite 341
Minneapolis, MN 55401

Stinson Leonard Street
Attn: Robert Kugler
50 South Sixth Street, Suite 2600
Minneapolis, MN 55402

Wells Fargo Bank, N.A.
Attn: Ann Abraham
875 34th Avenue
Winona, MN 55987

Merchants Bank
102 East Third Street
Winona, MN 55987

Thomas B. Wieser
Meier, Kennedy & Quinn
445 Minnesota Street
Suite 2200
Saint Paul, MN 55101

Scott V. Kelly
Farrish Johnson Law Office
1907 Excel Drive
Mankato, MN 56001

Stacy L. Sever
Stitch Angell Kriedler & Unke
250 2nd Avenue S.
Minneapolis, MN 55401

Phillip Kunkel
Gray Plant Mooty
1010 W. St. Germain
Suite 500
St. Cloud, MN 56301

Gerald H. Bren
Fisher Bren & Sheridan, LLP
920 Second Avenue South, Suite 975
Minneapolis, MN 55402

Catalina J. Sugayan
Robert E. Sweeney, Jr.
Clyde & Co. US LLP
55 West Monroe Street, Suite 3000
Chicago, IL 60603

Charles E. Jones
Moss & Barnett
150 South Fifth Street, Suite 1200
Minneapolis, MN 55402

Keith A. Dotseth
Bradley R. Prowant
Larmon King LLP
2800 Wells Fargo Place
30 E. Seventh Street
St. Paul, MN 55101

Stephen D. Straus
Eric D. Suben
Traub Lieberman Straus & Shrewsberry LLP
Mid-Westchester Executive Park
Seven Skyline Drive
Hawthorne, NY 10532

Dale O. Thornsjo
Lance D. Meyer
O'Meara, Leer, Wagner & Kohl, P.A.
7401 Metro Boulevard, Suite 600
Minneapolis, MN 55439-3034

Amy J. Woodworth
Meagher & Geer, PLLC
33 South Sixth Street, Suite 4400
Minneapolis, MN 55402

Michael J. Cohen
Pamela J. Tillman
Meissner Tierney Fisher & Nichols S.C.
111 E. Kilbourn Avenue, 19th Floor
Milwaukee, WI 53202

Eric E. Caugh
Rolf E. Gilbertson
Zelle LLP
500 Washington Avenue South, Suite 4000
Minneapolis, MN 55415

VIA PRIORITY MAIL EXPRESS

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Minnesota Department of Revenue
Mail Station 5130
St. Paul, MN 55146-5130

Wells Fargo Bank, N.A.
P.O. Box 6995
Portland, OR 97228-6995

Christian Brothers Investment Services
P.O. Box 9683
Providence, RI 02940